

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE: BRAC GROUP, INC. (F/K/A BUDGET GROUP, INC., <u>ET AL.</u>),)	Chapter 11
)	
Debtors.)	Case No. 02-12152 (MFW)
)	
IN RE: BRAC GROUP, INC. (F/K/A BUDGET GROUP, INC., <u>ET AL.</u>),)	(Jointly Administered)
)	
Plaintiffs,)	
)	
v.)	Adversary No. A-03-54271
)	
JAEBAN (U.K.) LIMITED,)	
)	
Defendant.)	
)	

MOTION TO WITHDRAW

The law firm of Morris, Nichols, Arsh & Tunnell (“Morris Nichols”) hereby moves the Court for an Order permitting it to withdraw as counsel for defendant, Jaeban (UK), Ltd. (the “Defendant”). In support of this motion, Morris Nichols states as follows:

1. The grounds for this motion are that the Defendant has failed substantially to fulfill its obligations regarding the firm’s services, and has been given reasonable warning that the firm would withdraw unless Defendant’s obligations were fulfilled.
2. Morris Nichols has agreed to take all steps necessary to the extent reasonably practicable to protect Defendant’s interests, including assisting Defendant in finding other counsel and surrendering papers and property to which the client is entitled.

3. Defendant is represented by Wragge & Co., its counsel in the United Kingdom. Wragge & Co. intends to continue to represent Defendant in connection with this proceeding.

4. Morris Nichols has conferred with counsel for plaintiffs and informed plaintiffs that it will be filing the instant motion.

For the foregoing reasons, Morris Nichols respectfully requests entry of an order in the form attached as Exhibit A permitting it to withdraw as counsel for Defendants.

MORRIS, NICHOLS, ARSHT & TUNNELL



R. Judson Scaggs, Jr. (#2676)
Thomas W. Briggs, Jr. (#4076)
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200

January 7, 2004